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12 Attorneys for Plaintiff

13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 SUSAN NICHOLSON HOFHEINZ, an  
16 Individual,

17 Plaintiff,

18 v.

19 HARLENE STEIN, an individual and  
20 doing business as "PERMA  
21 PRODUCTIONS"; *et al.*,

22 Defendants.

Case No.: CV12-09312 DSF (MANx)  
Honorable Dale S. Fischer Presiding

**STIPULATION TO DISMISS  
ACTION**

**[[PROPOSED] ORDER LODGED  
CONCURRENTLY HEREWITH]**

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1 TO THE HONORABLE COURT, ALL PARTIES, AND THEIR COUNSEL  
2 OF RECORD:

3 PLEASE TAKE NOTICE THAT Plaintiff SUSAN NICHOLSON  
4 HOFHEINZ, on the one hand, and Defendant AMAZON.COM, INC., on the other,  
5 hereby STIPULATE as follows:

- 6 1. Plaintiff's remaining claims as set forth in this action against  
7 AMAZON.COM, INC. are hereby dismissed with prejudice;
- 8 2. This dismissal is subject to and predicated upon the settlement  
9 agreement that gave rise to this dismissal;
- 10 3. The parties will each bear their respective costs and attorneys' fees as  
11 incurred against one another in connection with this action; and
- 12 4. The Court will retain jurisdiction to enforce the terms of the settlement  
13 agreements entered into in this matter.

14 SO STIPULATED.

15 Dated: July 30, 2014

16 By: /s/ Trevor W. Barrett  
17 Scott A. Burroughs, Esq.  
18 Trevor W. Barrett, Esq.  
19 Doniger / Burroughs APC  
Attorneys for Plaintiff  
Susan Nicholson Hofheinz

20 Dated: July 30, 2014

21 By: /s/ Allan E. Anderson  
22 ALLAN E. ANDERSON  
23 TIMOTHY L. SKELTON  
24 Attorneys for Defendant  
25 Amazon.com, Inc.  
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